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JUN 21 2021

HLW: USAO 2021R

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

BY

AT GREENBELT
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND

DEPUTY

UNITED STATES OF AMERICA

*

*

v.

*

CASE NO. GLS-21-01867

*

JOSE EDMUNDO SANCHEZ, Jr.,

*

FILED UNDER SEAL

*

Defendant

*

*

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Joseph Hayes, being duly sworn, hereby depose and state as follows:

1. I make this affidavit in support of a criminal complaint and related arrest warrant for **JOSE EDMUNDO SANCHEZ, Jr. ("SANCHEZ")** for violations of 18 U.S.C § 113(a)(4) (assault by striking, beating or wounding); 36 C.F.R § 2.4(b)(1)(i) (possession a weapon, trap or net); and 36 C.F. R. §2.34(a)(2) and (a)(4) (disorderly conduct).

2. I am a police officer with the United States Park Police. My responsibilities include law enforcement on properties administered by the National Park Service. The Chesapeake and Ohio Canal National Historical Park ("park") is in Maryland on lands within the special maritime and territorial jurisdiction of the United States and administered by the National Park Service. This affidavit is based on my personal observations and reports from others. It is intended to provide probable cause and does not contain every fact known to me.

3. On 6/8/21, V1, a visitor to the park, reported that she was walking along a trail when she encountered a man, later identified as **SANCHEZ**. **SANCHEZ** exposed his genitalia to V1. **SANCHEZ** then followed the woman along the trail for a while from a distance, making V1 uncomfortable. V1 used her cellphone to call the police. **SANCHEZ** saw V1 using her cellphone and left. V1 wrote down the license plate of the car with Virginia tags that **SANCHEZ**


got into. She gave a description of the man, later identified as **SANCHEZ**, to the police. **SANCHEZ** was not found that day.

4. On 6/10/21, another woman ("V2") was on a trail and wanted to pass a man, later identified as **SANCHEZ**, who was walking more slowly. V2 asked if she could pass. **SANCHEZ** moved to let her pass, and then slapped V2 with an open hand, grabbed her buttocks and said, "Take off your pants, girl." V2 ran to the towpath and yelled for help; other visitors came to help her, and V2 called and made a report to the police. V2 gave a description of the man, later identified as **SANCHEZ**, to the police. **SANCHEZ** was not found that day.

5. On 6/14/21, another woman ("V3") was talking along the towpath. She passed a man, later identified as **SANCHEZ**. **SANCHEZ** turned around and followed V3, speeding up to get closer to V3. V3 offered to allow **SANCHEZ** to pass. **SANCHEZ** then blocked V3's path and said, "I think we should turn around." As he said that, **SANCHEZ** brandished a knife, placed his hand on V3's shoulder to turn her around, and said, "I promise I'm not going to hurt you." V3 screamed "No," and **SANCHEZ** pushed her into some thorny bushes in the tree line on the river side of the path and fled. V3 called the police and gave them a description of **SANCHEZ**. The defendant was not found that day.

6. On 6/16/2021, I was working plainclothes duty in the park looking for this defendant. I saw **SANCHEZ** walking in the woods onto the towpath. As I passed him, **SANCHEZ** said to me, "suck my dick," and about 30 seconds later, "Hey, you want a blow job?" As he said that, **SANCHEZ** pulled down his pants and separated his buttocks so that his anus was fully exposed and clearly visible to me. I placed **SANCHEZ** under arrest.

7. At the police station, **SANCHEZ** admitted to all the incidents. He matched the description of the man who encountered or assaulted V1, V2 and V3.



Det. Sgt. Joseph Hayes
United States Park Police

Affidavit submitted by email and attested to me as true and accurate by telephone, consistent with Fed. R. Crim. P. 4.1 and 4(d) this 21st day of June 2021.



The Honorable Gina L. Simms
United States Magistrate Judge